

SHER TREMONTE LLP

September 20, 2021

VIA EMAIL AND ECF

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007-1312

Re: *United States v. Jean-Claude Okongo Landji et al.*,
Case No. 18 Cr. 601 (PGG)

Dear Judge Gardephe:

We write on behalf of our client, Jean-Claude Okongo Landji, to respectfully request that the Court order that Mr. Landji not be transferred out of the Metropolitan Correctional Center (“MCC”) until after the upcoming trial, scheduled to commence on October 6, 2021.

Mr. Landji is currently being housed at the MCC. News reports have recently indicated that the MCC is scheduled to be shut down and the individuals housed there relocated.¹ Based on a conversation earlier today with a corrections officer at MCC, it is our understanding that all persons being held at the MCC will be transferred to the Metropolitan Detention Center (“MDC”) by the end of this month. We further understand, based on reports from the Federal Defenders and other colleagues on the CJA Panel, that upon transfer to the MDC, all inmates are required to quarantine for two weeks. While in quarantine, detainees are not able to meet with the lawyers or review discovery. If quarantine were to be imposed during trial, then, it would obviously seriously hinder Mr. Landji’s ability to participate in his own defense and our ability to meet with him and represent him effectively.

Given that Mr. Landji’s trial is scheduled to commence on October 6, 2021, we respectfully request that the Court order that he remain at the MCC through the

¹ See, e.g., Noah Goldberg & Stephen Rex Brown, *NYC Federal Jail Where Jeffrey Epstein Killed Himself To Close*, Daily News, (Aug. 26, 2021, 5:35 PM), <https://www.nydailynews.com/new-york/ny-manhattan-federal-jail-mcc-closing-gut-troubled-jefrey-epstein-20210826-uncwx3dddja6vjqovnrsegumi-story.html>.

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completion of trial. We have spoken with counsel for Mr. Adamu and they join in this request on behalf of their client.

Respectfully submitted,

/s/

Michael Tremonte
Noam Biale
Katie Renzler
SHER TREMONTE LLP

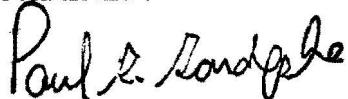
Attorneys for Jean-Claude Landji

cc: All counsel of record (via ECF)

MEMO ENDORSED

The Court has asked the USMS to arrange for the defendants to remain at the MCC through the trial. Defense counsel is directed to immediately contact Chambers if they are unable to meet with Defendants for trial preparation.

SO ORDERED.



Paul G. Gardephe
United States District Judge

September 22, 2021